

Federal Defenders OF NEW YORK, INC.

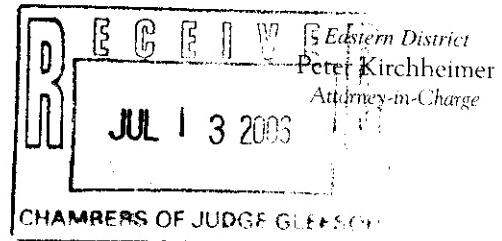
Eastern District
16 Court Street - 3rd Floor, Brooklyn, NY 11241
Tel: (718) 330-1200 Fax: (718) 855-0760

FILED

IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ JUL 18 2006 ★

BROOKLYN OFFICE



July 13, 2006

Via Facsimile

The Honorable John Gleeson
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn New York 11201

s/John Gleeson

Re: United States v. Ivan Moreno, 06 CR 425

Your Honor:

My client, Ivan Moreno, is charged with possession with intent to distribute heroin. Mr. Moreno was released on a \$500,000 bond. He was arraigned on the indictment on Tuesday, July 11, 2006 and entered a not guilty plea. The first status conference is scheduled before Your Honor on July 27, 2006 at 3:30 p.m.

I am writing to respectfully request on behalf of my client and the government that Your Honor make the necessary findings and exclude the time between today, July 13, 2006 and July 27, 2006 under the Speedy Trial Act. Both parties are requesting the exclusion because we need time to discuss the possibility of a plea, without the risk that we would not subsequently have sufficient time to prepare for trial.

I appreciate the Court's consideration.

Respectfully submitted,

Justine A. Harris
Staff Attorney
(718) 407-7403

cc: AUSA Elizabeth Latif